

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:)	Chapter 11
)	Case No. 25-10068 (CTG)
JOANN INC., <i>et al.</i> , ¹)	(Jointly Administered)
)	
Debtors.)	
) Objection Deadline: May 14, 2025 at 4:00 p.m.
) Hearing Date: May 21, 2025 at 10:00 a.m.

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT the undersigned counsel has filed the Motion of Ocean Network Express (North America) Inc., *et al.* for Relief from the Automatic Stay of 11 U.S.C. § 362 or to compel abandonment and to deem certain goods abandoned pursuant to 11 U.S.C. § 554 (the “Motion”).

PLEASE TAKE FURTHER NOTICE THAT if you wish to respond to the Motion, you are required to file such response **on or before May 14, 2025 at 4:00 p.m. prevailing Eastern time** (the “Objection Deadline”).

At the same time, you must serve a copy of such response on the undersigned counsel so as to be received by the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT a hearing on the Motion will be held **May 21, 2025 at 10:00 a.m. prevailing Eastern time** before the Honorable Craig T. Goldblatt, United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Courtroom #7, Wilmington, Delaware 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

The attorneys for the parties shall confer with respect to the issues raised by the motion in advance for the purpose of determining whether a consent order may be entered and/or for the purpose of stipulating to relevant facts such as value of the property, and the extent and validity of any security agreement.

Dated: April 30, 2025
Wilmington, Delaware

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

HOGAN MCDANIEL

By: /s/ Daniel C. Kerrick
Daniel C. Kerrick, Esq. (DE Bar ID # 5027)
1311 Delaware Avenue
Wilmington, DE 19806
Tel: (302) 656-7540
Fax: (302) 656-7599

PRICE MEESE SHULMAN & D'ARMINIO, P.C.

By: /s/ Rick A. Steinberg
Rick A. Steinberg
50 Tice Boulevard, Suite 280
Woodcliff Lake, New Jersey 07677
Tel: (201) 391-3737
Fax: (201) 343-9360

**ATTORNEYS FOR OCEAN NETWORK EXPRESS
(NORTH AMERICA) INC.**